

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:
Flint Water Litigation

Case No. 16-cv-10444
Hon. Judith E. Levy
Mag. Elizabeth A. Stafford

**EXHIBIT 2 TO
NON-PARTY NICOLE FLOTTERON'S
MOTION FOR PROTECTIVE ORDER**

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

IN RE:

FLINT WATER LITIGATION

Civil Action No. 16-cv-10444

Hon. Judith E. Levy
Mag. Elizabeth A. Stafford

**DECLARATION OF STEVEN PARADISE
IN SUPPORT OF NON-PARTY NICOLE
FLOTTERON'S MOTION FOR A
PROTECTIVE ORDER**

I, Steven Paradise, declare under penalty of perjury that the following is true and correct:

1. I am an attorney duly licensed to practice law before the Courts of the State of New York and I am a Partner at Eisner, LLP, counsel to non-party Nicole Flotteron ("Ms. Flotteron").
2. I submit this declaration in support of Ms. Flotteron's Motion for a Protective Order, requesting that the Court forbid her deposition from taking place on August 8, 2023, or any date thereafter, pursuant to the Subpoena served upon Ms. Flotteron by Plaintiffs on or about July 11, 2023 (the "Subpoena").
3. The purpose of this declaration is to place before the Court certain documents that are discussed, and whose relevance is explained, in the Memorandum of Law in Support of Non-Party Nicole Flotteron's Motion for a Protective Order.
4. Attached hereto as Exhibit A is a true and correct copy of the Subpoena.
5. Attached hereto as Exhibit B is a true and correct copy of the subpoena served by Plaintiffs upon non-party Jennifer Kaufmann, dated December 13, 2022.

6. Attached hereto as Exhibit C is a true and correct copy of the Objection to Subpoena to Testify at a Deposition in a Civil Action to Jennifer Kaufmann, dated January 3, 2023.

7. Attached hereto as Exhibit D is a true and correct copy of the subpoena served upon non-party Michael McKeon, dated May 15, 2023.

8. Attached hereto as Exhibit E are true and correct copies of the transcripts of the deposition of non-party Michael McKeon, taken on June 12, 2023 and June 27, 2023.

9. Attached hereto as Exhibit F is a true and correct copy of the transcript of the Discovery Hearing conducted by the Court in this action on February 8, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 4, 2023



Steven Paradise